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August 15, 2018

Via ECF

The Honorable Gregory H. Woods, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Rodriguez v. Castle Check Cashing Corp., et al.*
Case No. 17 CV 9930 (GHW)

Dear Judge Woods:

We represent Plaintiff in the above referenced matter. We write to respectfully request that the Court set a control date of August 24, 2018 for Defendants to produce all payroll records, time records, and wage statements for putative Rule 23 class members.

The Court directed Defendants to produce the above-referenced discovery materials during the August 6, 2018 teleconference. The Court further directed the parties to confer in an effort to agree on a deadline for such production. The undersigned contacted opposing counsel via telephone after the teleconference on August 6, 2018, and then again on August 9, 2018 to request that Defendants provide a date certain for the Court-ordered production. However, Defendants' counsel advised on both occasions that he was unable to provide a production date. The undersigned sent a follow-up email to opposing counsel on August 13, 2018 once again requesting that Defendants provide a timeline for production, but no response has been received as of this date.

For the reasons stated above, we respectfully request that the Court set August 24, 2018 as the production deadline for Defendants to provide the outstanding class discovery. We thank the Court for considering this matter.

Respectfully submitted,

/s/ Taimur Alamgir
Taimur Alamgir, Esq.

cc: Defendants via ECF